

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ILLINOIS UNION INSURANCE COMPANY
as subrogee of CITY OF LAWRENCE

Plaintiff,

v.

THE VIKING CORPORATION

Defendant.

) CIVIL ACTION

) NO.04-10475 MEW

)

)

) JURY TRIAL DEMANDED

)

) MOTION FOR ADMISSION OF

) COUNSEL *PRO HAC VICE*

RECEIVED #

AMOUNTS

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SCANNED
DATE: 5-3-05
BY: KRB

NOW COMES Patrick J. Loftus, III, Esquire, Counsel for Plaintiff, Illinois Union Insurance Company as subrogee of City of Lawrence, and respectfully moves this Court to enter an Order, in the form attached, for the admission *pro hac vice* of Joseph F. Rich, Esquire, of the law firm of Cozen O'Connor, to appear herein as counsel for Plaintiff.

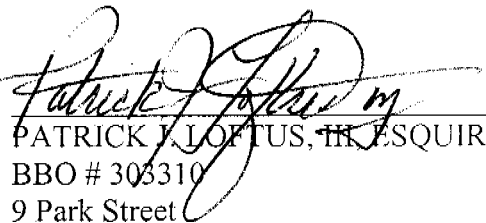
In support of this motion, Movant states as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts, and am attorney for Plaintiff in the above-captioned action.
2. The above-captioned action involves a water discharge incident, with resulting damage sustained by the City of Lawrence.
3. The above-captioned action was commenced in March, 2004.
4. I have been acting as local counsel for Plaintiff with respect to this matter; as local counsel for the Plaintiff, I have cooperated with Mr. Rich, who has also prepared the case and is also ready to proceed with discovery and trial.
5. I know Mr. Rich to be a qualified attorney with experience in the areas of product liability and property damage litigation and other issues being presented in this lawsuit and to be a member in good standing of the Bar of the Commonwealth of Pennsylvania.

6. In further support of its motion, Movant incorporates, by reference, the annexed Affidavit of Joseph F. Rich, Esquire [see Exhibit "A"].

WHEREFORE, Movant respectfully requests that the Court grant an order allowing the admission *pro hac vice* of Joseph F. Rich, Esquire, to practice with respect to the above-entitled action.

Plaintiff Illinois Union Insurance Company
as subrogee of City of Lawrence,
By Its Attorney,

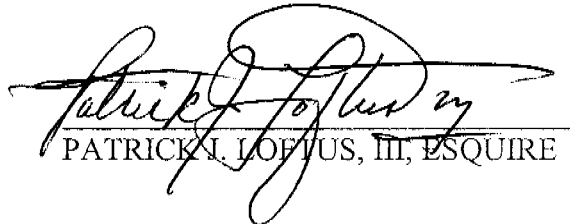


PATRICK J. LOFTUS, III, ESQUIRE
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(617) 723-7770

CERTIFICATE OF SERVICE

I, PATRICK J. LOFTUS, III, attorney for Plaintiff, do hereby certify that I have this 27 day of April, 2005, served a copy of the foregoing Motion for *Pro Hac Vice* Admission upon counsel of record, by mailing said copy, postage prepaid, to:

Joseph J. Leghorn, Esquire
Gina M. McCreadie, Esquire
Nixon Peabody, LLP
100 Summer Street
Boston, MA 02110


PATRICK J. LOFTUS, III, ESQUIRE